AGP
Ag Processing Inc

June 10, 2013

SENT VIA EMAIL and CERTIFIED MAIL

Jeremy Arndt
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road; Suite 1
Windsor Heights, Iowa 50324

RE: Title V Operating Permit 99-TV-004R1; Ag Processing Inc – Sergeant Bluff, Iowa
Title V Operating Permit 05-TV-005R1; Ag Processing Inc – Eagle Grove, Iowa
Follow up information from March 14, 2013 meeting

Jeremy Arndt;

Ag Processing Inc (AGP) is providing the following additional information requested by the IDNR as a result of discussions held during a March 14, 2013 meeting.

In a March 26, 2013 email, Anne Preziosi requested that AGP provide to you the following information.

1. *You will send to Jeremy Arndt a list of the emission points affected by the appeals where the process cannot operate without the operation of the control equipment.*
2. *You will send to Jeremy Arndt a list of the emission points affected by the appeals where the process can operate without the operation of the control equipment.*
3. *You will send to Jeremy Arndt process flow diagrams for the equipment and emission points affected by the appeals documenting how the material collected is transferred back into the process stream.*
4. *Regarding permits issued to AGP by the states of Minnesota and Missouri, you will send to Jeremy Arndt documents authored by AGP or those states, regarding the designation of inherent process equipment for CAM purposes.*

The requested information for items 1, 2, and 3 has been arranged by facility and emission point. Emission points (EP) have been grouped together where appropriate. Simplified process flow diagrams have been attached. They are labeled by facility name and EP numbers. Sections of the requested permits in item 4 are discussed and attached.

12700 West Dodge Road P.O. Box 2047 Omaha, NE 68103-2047 (402) 496-7809

AGP Sergeant Bluff, IA Facility; ***EP-40, EP-60, EP-61, EP-62 & EP-78***

- EP-40 Truck Loadout & EP-78 Rail Loadout Aspiration

  The primary function of the aspiration hoods along with the associated bagfilters for both EP-40 (Truck Meal Loadout) and EP-78 (Rail Loadout Aspiration) is to prevent loss of product (soybean meal) during the meal loadout process. (EP-78 also has a slinger that is integrated into the aspiration hood that facilitates more effective loading of the railcars.) The operation of the loadout conveyors and loadout hoods is interlocked with the operation of the bagfilters. The truck loadout process and the rail loadout process cannot be operated without the bagfilter being in operation. All of the product that is recovered by the bagfilter is returned to either the loadout conveyor (EP-78) or to the storage bins (EP-40). (See attached simplified process flow diagram.)

- EP-60 Meal Dryer/Cooler-Deck 2, EP-61 Meal Dryer/Cooler-Deck 3, EP-62 Meal Dryer/Cooler-Cooler Deck

  A meal Dryer/Cooler typically consists of both drying and cooling decks. Meal drying and cooling is a process that removes the residual moisture from extracted flakes to enable final processing of the meal into its finished products. As high air flows are used to provide drying, then cooling air, the industry standard for these processes is to include a high efficiency cyclone collection system for product recapture and reintroduction. Dryer/coolers are always installed with a recapture device (cyclone), or the amount of product loss would be prohibitive. Thus, the industry standard practice is installation of high efficiency cyclone recapture devices which are packaged as a part of the dryer/cooler installation by vendors. The Dryer/Cooler decks cannot be operated without the associated cyclones that have long been considered integral to the Dryer/Cooler process.

  All of the product recovered by the cyclones is returned back to the process stream. (See attached simplified process flow diagram.)

AGP Eagle Grove, IA Facility;
EP-1, EP-2, EP-3, EP-4, EP-5, EP-6, EP-12, EP-14, EP-31, EP-34, EP-35 & EP-65

- EP-1, EP-3, & EP-5; Grain Receiving and EP-2, EP-4 & EP-6; Grain Handling

  The primary purposes of the aspiration and associated bagfilters for each of the above emission points at the grain receiving process are to; prevent loss of product and aid in the proper operations of grain conveying equipment.

  AGP purchases soybeans on an 'as received' basis as determined by scale weights of the trucks, before and after dumping the beans at the receiving pits. Any product that was lost in the receiving process would still be part of the 'received' product volume. AGP employs the use of aspiration at the receiving pits to prevent the loss of product. All of the product recovered in the receiving pit aspiration bagfilters is collected and conveyed to the receiving storage bins. (See attached simplified process flow diagram.) The receiving pit conveyors are interlocked with the bagfilters and cannot operate without the receiving pit aspiration being in operation.

All of the conveyors associated with grain handling are covered/enclosed conveyors. As product is conveyed air is displaced and pressure builds up in the enclosed conveyance. AGP vents/aspirates the conveyors to relieve the pressure and allow more efficient transport of the product. The aspirated air is routed through the bagfilters to recover the product entrained in the air. All recovered product is collected and conveyed to the receiving storage bins (See attached simplified process flow diagram.) The grain handling conveyors are interlocked with the bagfilters and cannot operate without the associated aspiration being in operation.

- EP-12 & EP-14 Cracking and Dehulling

  The soybean dehulling operations consist of a multi-step process to crack the beans and remove and separate the hulls from the beans before further processing. The process uses a significant amount of air to move the beans and hulls. The beans are recovered by using cyclones. As illustrated in the attached simplified process flow diagram for these EPs, the recovered hulls and/or soybean cracks are returned directly to the process. Cracking and dehulling cannot operate without the associated volumes of air and the collection/separation of hulls and soybean cracks by the cyclones.

- EP-31 Railroad Car Bulk Loading & EP-65 Rail Meal Loadout

  The primary function of the aspiration hood and conveyor aspiration along with the associated bagfilters for both EP-31 and EP-65 is to prevent loss of product (soybean meal) during the meal loadout process. (EP-65 also has a slinger that is integrated into the aspiration hood that facilitates more effective loading of the railcars.) The operation of the loadout conveyors and loadout hood is interlocked with the operation of the bagfilters. The rail loadout process cannot be operated without the bagfilter being in operation. All of the product that is recovered by both bagfilters is returned directly to the loadout conveyor. (See attached simplified process flow diagram.)

- EP-34 Stoker Boiler #1 & EP-35 Stoker Boiler #2

  Emission points EP34 and EP35 are subject to 40 CFR 63 Subpart DDDDD Industrial/Commercial/Institutional Boiler & Process Heaters which is a NESHAP emission standard that was proposed after November 15, 1990. In the applicable NESHAP, particulate emissions are regulated as a surrogate for NESHAP emissions.

  The bagfilters associated with EP34 and EP35 are subject to *"emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to either Section 111 or 112 of the Clean Air Act."* They are therefore not subject to CAM.

  The bagfilters and associated boiler are interlocked and the boilers cannot operate without the bagfilters being in operation.

Other Agency CAM Determinations

- AGP Dawson, MN Facility

  Attached is the CAM portion of the Title V renewal application for the AGP, Dawson, MN facility. Based on the CAM definitions in 40 CFR Part 64 of 'control device' and 'inherent process equipment', along with the fact that all recovered material was being returned to the process, the MPCA determined that CAM was not applicable to any sources at the Dawson facility.

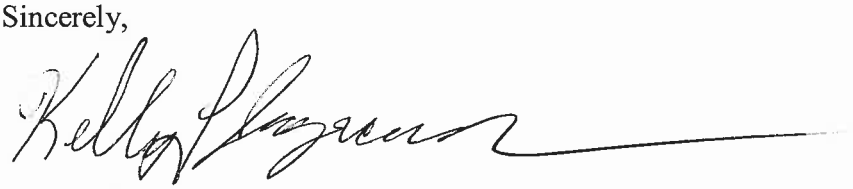
- AGP St. Joseph, MO Facility

  The MDNR went through a more detailed evaluation but in the end determined that no sources were subject to CAM at AGP's St. Joseph, MO facility. The CAM section of the latest Title V permit has been attached.

  It should be noted that the MDNR determined that the bean receiving EP-8 was not subject to CAM requirements by calculating potential emissions (approximately 40 tons/year) based on the physical/operational design of the facility to be able to process (and therefore 'receive') only 1,314,000 tons of soybeans per years (equivalent to 120,000 bushels/day) and a conservative grain handling emission factor of 0.061 lbs/ton. The Eagle Grove facility has a physical/operational design of 123,000 bushels per day (1,346,850 tons). Using the same emission factor and conservatively assuming that all soybeans were received and handled at only one (instead of three) receiving points, the annual uncontrolled potential emissions for EP-1, EP-2, EP-3, EP-4, EP-5, or EP-6 would each only be ~41 tons/year.

Please contact me if you have any questions or need additional information.

Sincerely,

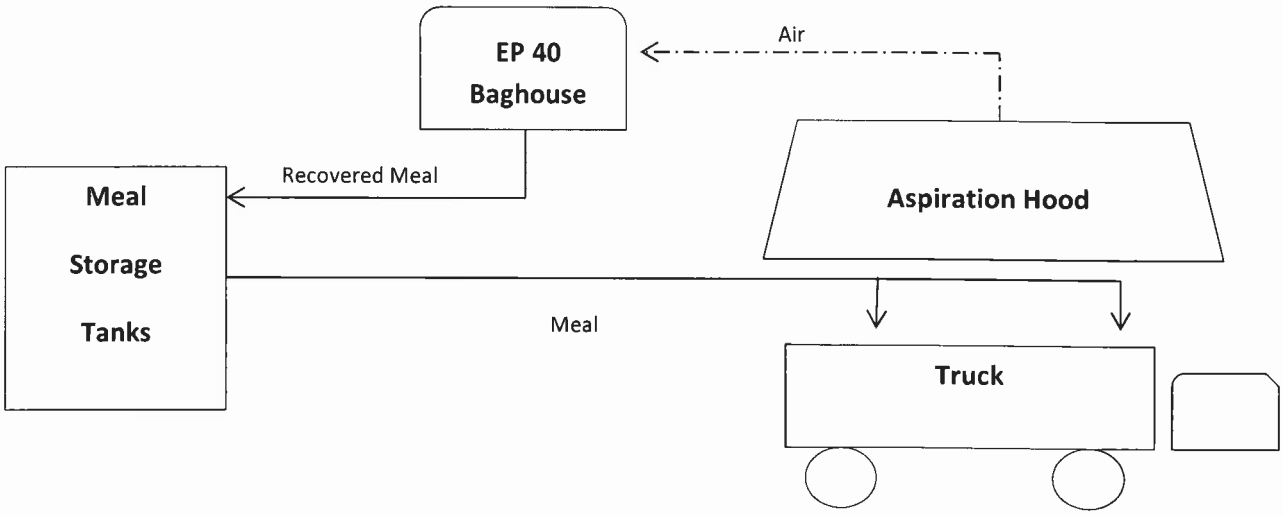


Kelly P. Jorgensen
Director of Environmental Compliance
402-498-5501
kjorgensen@agp.com

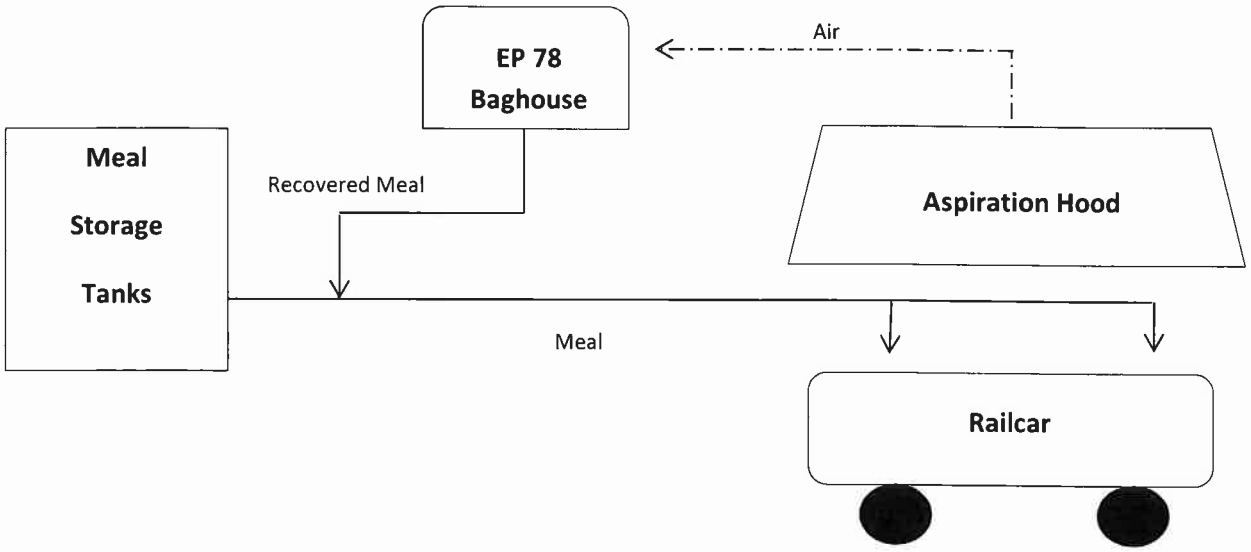
Attachments: Process Flow Diagrams (4 pages)
AGP Dawson, MN; Title V Permit Application, CAM Section (13 pages)
AGP St. Joseph, MO; Title V Permit, CAM Section (4 pages)

cc: Anne Preziosi – IDNR
Weston Li – IDNR
Joe Kirby – AGP Sgt Bluff
Lori Hanson – IDNR
Ernie Kiley – AGP, Omaha
Jeff Lampman – AGP Eagle Grove

AGP Sergeant Bluff – EP 40 Truck Loadout

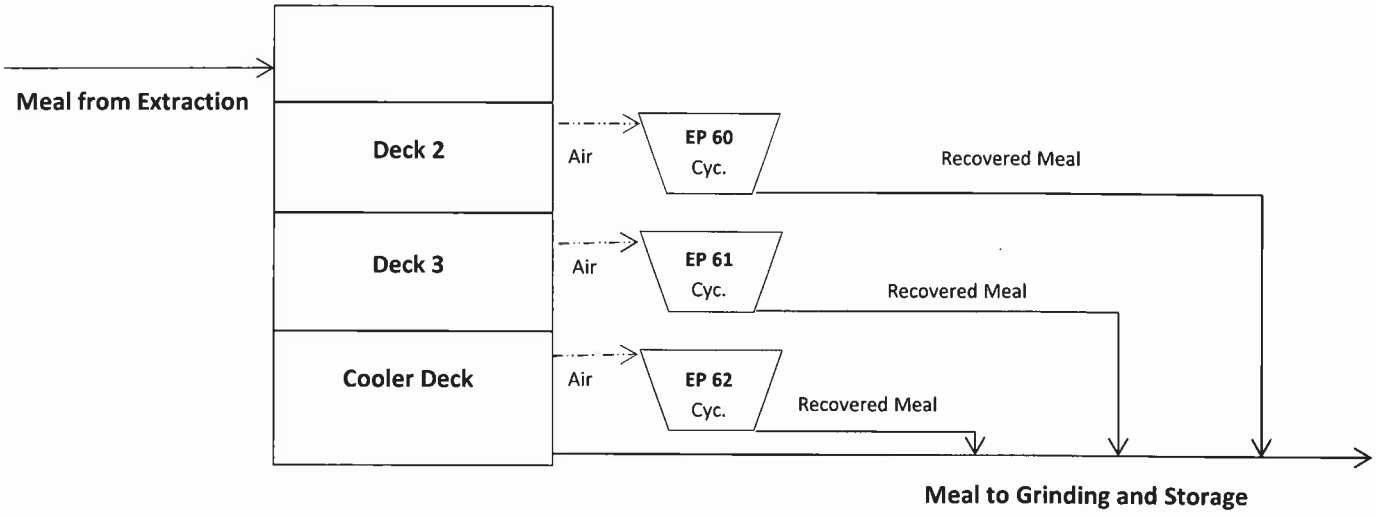


AGP Sergeant Bluff – EP 78 Rail Loadout



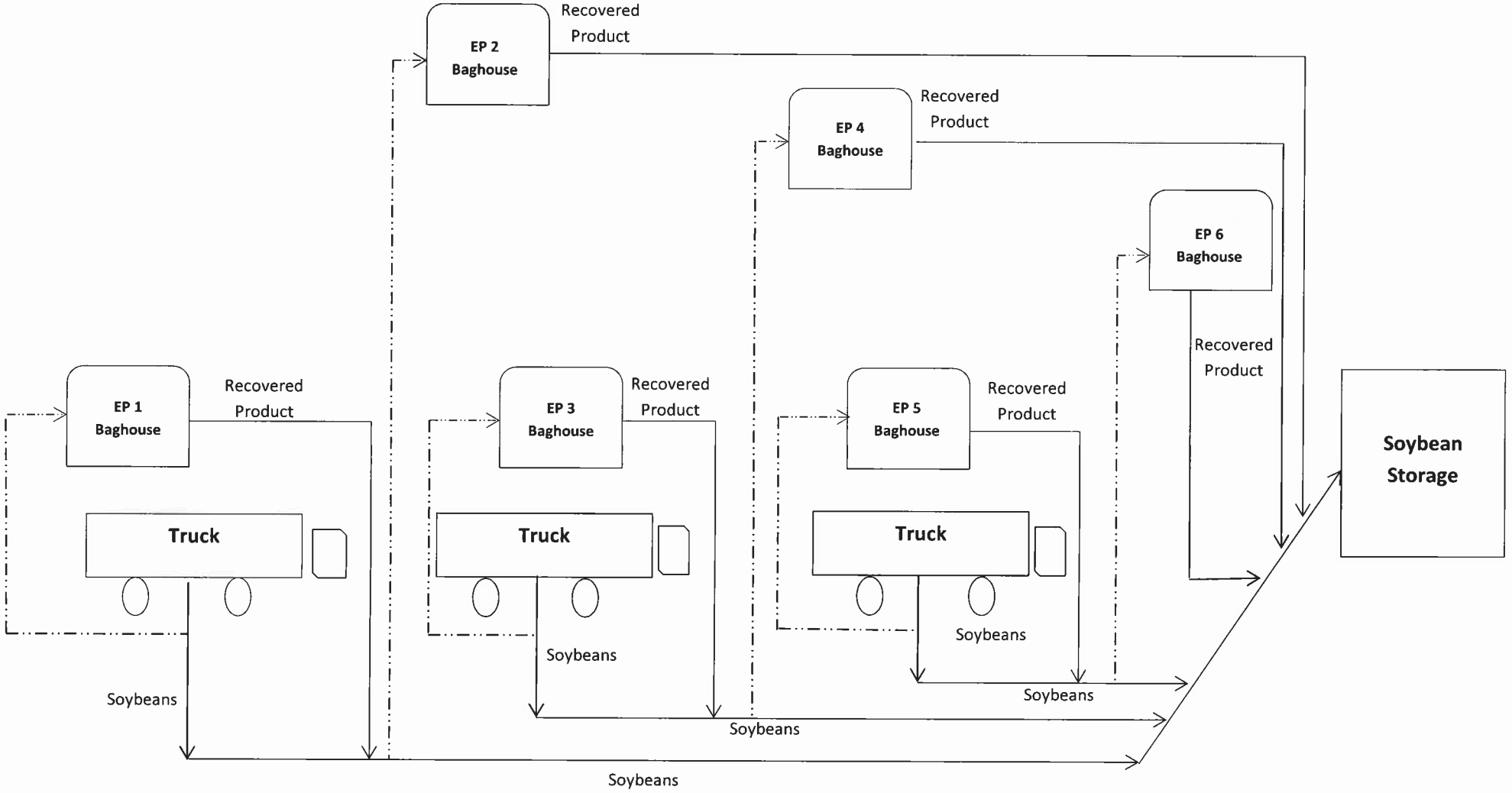
AGP Sergeant Bluff

EP 60 – Meal Dryer / Cooler (Deck 2)
EP 61 – Meal Dryer / Cooler (Deck 3)
EP 62 – Meal Dryer / Cooler (Cooler Deck)

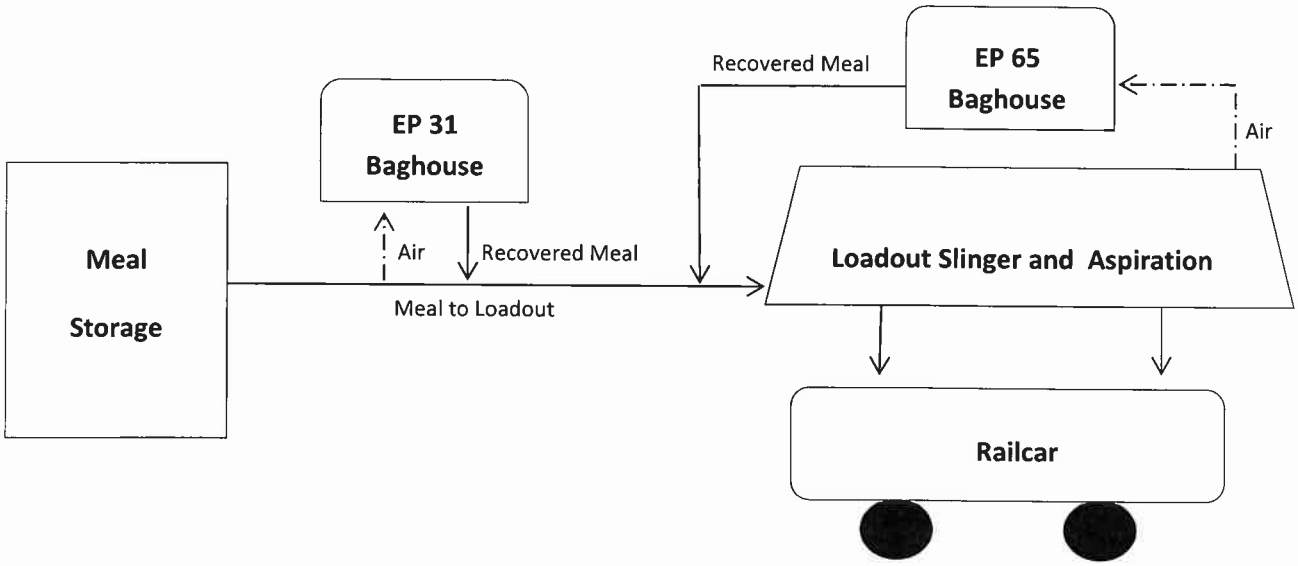


AGP Eagle Grove

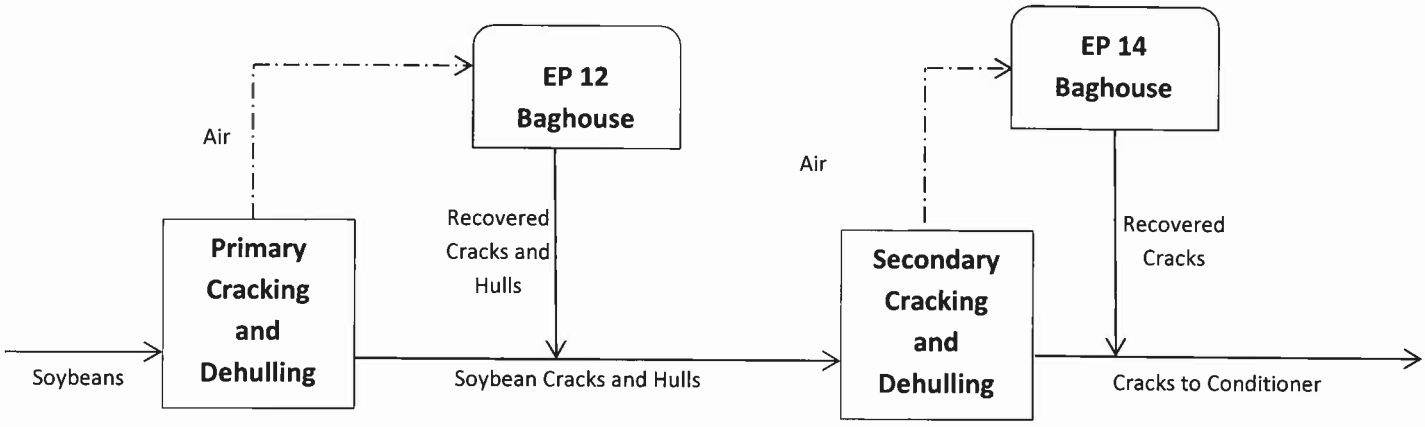
EPs 1, 2, 3, 4, 5 and 6



AGP Eagle Grove – EP 31 and EP 65



AGP Eagle Grove EP 12 and EP 14



Part 70 Air Emissions Operating Permit Reissuance Application

Ag Processing Inc
Dawson, Minnesota

Wenck File #0628-10

Prepared for:

Ag Processing Inc
800 Diagonal Street
Dawson, Minnesota 56232

Prepared by:

WENCK ASSOCIATES, INC.
1800 Pioneer Creek Center
P.O. Box 249
Maple Plain, Minnesota 55359-0249
(763) 479-4200

August 2008

Minnesota Pollution Control Agency
AIR QUALITY
520 LAFAYETTE ROAD NO., ST. PAUL, MN 55155-4194

FACILITY DESCRIPTION:
Potential-to-emit (by item)
SUPPLEMENTAL INFORMATION
PART 70 REISSUANCE FORM **GI-07-R**
DRAFT 05/11/06

To complete this form, you will need the colored sheet(s) labeled FACILITY DESCRIPTION: Potential to Emit (by item).

1) AQ Facility ID No.: 07300002 2) Facility Name: Ag Processing Inc - Dawson

3) Review the information on the colored sheet(s) labeled "Facility Description: Potential-to-emit (by item)." Is the information on the form complete and accurate (i.e., are the emissions from every emission unit, storage tank, fugitive source, and/or group accounted for? If there were stack tests completed, are the results reflected in the potential to emit summary?)?

☒ Yes – The "Facility Description: Potential-to-emit (by item)" form is complete and accurate. No changes are necessary. Done with this form. Return this page with your application.

☐ No – Go to Question 4.

4) Are there changes to be made to the numbers that are listed? [NOTE: This does not include adding the emissions from units that are not included on the form.]

☐ Yes – Using a red pen, make those changes on the colored sheet. Go to Question 5.

☐ No – Go to Question 5.

5) Are there emissions listed from equipment that is no longer at the facility?

☐ Yes – Using a red pen, draw a line on the colored sheet through those emissions. Go to Question 6.

☐ No – Go to Question 6.

6) Are there emissions from equipment or processes that you added on Form GI-04-R, GI-05B-R, GI-05C-R, or GI-05D-R? (either additional equipment, or equipment that replaced something you crossed out for Question 5)?

☐ Yes – Complete one line of the table on the next page for the emissions from each piece of equipment or process that is not currently listed on the white sheet. Return this form (pages 1 and 2) and the colored sheet(s) labeled "Facility Description: Potential-to-emit (by item)" with your application.

☐ No – Done with this form. Return this page and the colored sheet(s) form labeled "Facility Description: Potential-to-emit (by item)" with your application.

Minnesota Pollution Control Agency

AIR QUALITY
520 LAFAYETTE ROAD NO., ST. PAUL, MN 55155-4194

PERMIT APPLICATION FORM **GI-09H**

REQUIREMENTS: CAM (40 CFR pt. 64)

10/25/2006

Compliance Assurance Monitoring (40 CFR pt. 64)

The CAM rule applies to certain emission units at facilities required to obtain a Part 70 permit.

In general, CAM applies to emission units meeting the following criteria:

1. The emission unit is subject to an emission limit or standard (including limits and standards in Minnesota Rules contained in the State Implementation Plan) for an air pollutant regulated by Part 70;

2. Compliance with the applicable limit or standard is achieved through the use of add-on control equipment; and

3. The emission unit has pre-controlled potential emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the Part 70 major source level for that pollutant (in tons per year).

For exemptions, see Table C at the end of this form.

Use of continuous emissions monitoring system (CEMS), continuous opacity monitoring system (COMS), or predictive emission monitoring system (PEMS) does not qualify as an exemption to the CAM rule. However, 40 CFR §64.3(d) states that use of a CEMS, COMS, or PEMS meets the requirements of CAM.

CAM applicability is determined on a pollutant-by-pollutant basis for each "pollutant specific emissions unit," defined at 40 CFR § 64.1 as "an emissions unit considered separately with respect to each regulated air pollutant." For purposes of CAM submittal requirements, a "**large pollutant specific emissions unit**" is an emissions unit with potential controlled emissions equal to or greater than 100% of the major source threshold amount for a given regulated pollutant. ("Major source threshold amount" as it applies to Minnesota, means 100 tons per year of particulate matter (PM), particulate matter smaller than ten microns in aerodynamic diameter (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO_X), volatile organic compounds (VOC), carbon monoxide (CO), or lead; 10 tons per year of any hazardous air pollutant (HAP); or 25 tons per year of any combination of HAPs. The levels may be different in current or future nonattainment areas. Refer to 40 CFR § 70.2 under the definition of "major source" for further detail.) "**Other pollutant specific emissions units**" are those units whose uncontrolled potential emissions may be equal to or greater than 100% of the major source threshold amount, but controlled emissions are less than that threshold.

If you are applying for the first time for a Part 70 permit, after determining the uncontrolled and controlled potential emissions of the emissions units, the following questions must be considered for each **large** pollutant specific emissions unit, as defined above..

If you are applying for a major amendment to an existing Part 70 permit, after determining the uncontrolled and controlled potential emissions of the emissions units, the following questions must be considered for each **large** pollutant specific emissions unit, as defined above, to which the amendment is applicable.

If you are applying for reissuance of an existing Part 70 permit, after determining the uncontrolled and controlled potential emissions of the emissions units, the following questions must be considered for each pollutant specific emissions unit **(large and other)** for which CAM applicability has not already been determined through a Part 70 permitting action.

1) Is the unit subject to an emission limitation or standard, specified in either a rule or permit? For existing emission units, check your current permit to see if there are any emission limits specified for the emission unit.

☐ No, the emission unit is not subject to CAM. Record the EU number and reason CAM doesn't apply in Table B. Repeat question 1 for next emission unit.

☒ Yes, the emission unit is subject to an emission limitation or standard. Go on to question 2.

2) Is an add-on control device used to achieve compliance with that limitation or standard? (For example, a boiler may have a NO_X limit and an SO_2 limit. If the boiler uses lime injection for SO_2 control but relies on a low-NO_X burner to meet the NO_X limit, then the emission unit would be subject to CAM for SO_2 but not for NO_X.)

☒ No, the emission unit is not subject to CAM. Record the EU number and reason CAM doesn't apply in Table B. Return to question 1 and repeat for next emission unit.

Please refer to the Note following Table B that provides the explanation of why the EU's are not subject to CAM.

☐ Yes. Go on to question 3.

3) There are some exemptions allowed by the rule. Review the list of exemptions in Table C, then answer the following question.

☐ No, the emission unit is subject to CAM. List the emission unit in Table A and repeat questions 1 through 3 for the next emissions unit. When each emission unit has been considered, go on to complete the rest of Table A and Table B.

☐ Yes, the emission unit is exempt from CAM. List the emission unit in Table B and repeat questions 1 through 3 for the next emissions unit. When each emission unit has been considered, go on to complet the rest of Table A and Table B.

Table A. Emission Units Subject to CAM

EU #	Emission Unit	CE #	Description of Control Equipment	Pollutant(s) which are subject to CAM

Duplicate this table as needed.

You must prepare a CAM submittal for each unit listed in Table A, and provide it with the permit or amendment application. The CAM submittal, also referred to as the monitoring approach submittal, should include:

- information on indicators (gauges, meters, or other devices used to monitor operating parameters of control equipment)
- indicator ranges, or the process by which indicators are to be established
- performance criteria
- justification for the proposed monitoring
- control device operating data recorded during a performance test, supplemented by engineering assessments or manufacturer's recommendations to justify the proposed indicator range
- a test plan and schedule for obtaining data if performance test data are not available
- an implementation plan, if monitoring requires installation, testing or other activities prior to implementation

Some of this information will be incorporated into the operating permit. The permit will specify the approved monitoring approach and the indicator range(s), including the averaging periods.

Table B. Emission Units Not Subject to CAM

EU #	Why ? (not large enough, uncontrolled, exemption category from Table C, etc.)
157	No add-on control equipment
163	No add-on control equipment
165	No add-on control equipment
267	No add-on control equipment
269	No add-on control equipment
271	No add-on control equipment
631	No add-on control equipment
633	No add-on control equipment
635	No add-on control equipment
702	No add-on control equipment
703	No add-on control equipment
For the following units, please refer to the Note below for the explanation of why these units are not subject to CAM:	
101/103/105	SV001 / CE101 (Fabric Filter).
107	SV002 / CE107 (Fabric Filter)
109/113	SV003 / CE102 (Fabric Filter)
115/117/119/121	SV004 / CE103 (Fabric Filter)
121/123/125/129	SV005 / CE104 (Fabric Filter)
131/133/135	SV006 / CE106 (Fabric Filter)
137/139/141	SV007 / CE105 (Fabric Filter)
149/151/123	SV011 / CE108 (Fabric Filter)
201/203/205/207	SV018 / CE201 (Fabric Filter)
209/211/213/215/217/ 253/263/275	SV019 / CE208 (Cyclone)
127/225/226/227/228/ 229/230/231/233/235/ 237/239/241/261/301	SV020 / CE202 (Cyclone)
167	SV021 / CE203 (Cyclone)
305/307/308/309/311/ 313/315/317/318	SV027 / CE613 (Fabric Filter) (CE301 was replaced with CE613)
401	SV031 / CE401 (Cyclone)
402	SV029 / CE402 (Cyclone)
403	SV030 / CE403 (Cyclone)
601/603/607/609/611/ 613	SV036 / CE603 (Fabric Filter)
621	SV037 / CE606 (Cyclone)
623	SV038 / CE601 (Cyclone)
625/627/629	SV039 / CE602 (Cyclone)
603/643/645	SV048 / CE605 (Fabric Filter) No emission limits in permit.
647	SV049 / CE604 (Fabric Filter) No emission limits in permit.

Note: Particulate (PM and PM10) emissions for the Emission Units are taken at the Stack/Vent level in the Permit for Centrifugal Collections (cyclones) and Fabric Filters (baghouses). Although the cyclones and baghouses are listed as control equipment, they are inherent to the process; and all material recovered is reintroduced into the process. This is consistent with how these units were

addressed in the original Title V Operating Permit. The CAM rules (40 CFR Part 64) provide the following definitions for "Control Device" versus "Inherent Process Equipment":

> ***"Control device*** **means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere."**
>
> ***"Inherent process equipment*** **means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment."**

Based on the above definitions, the cyclones and baghouses at the facility qualify as inherent process equipment. No cyclone or baghouse is required to be operated at a higher efficiency than is used for process reasons in order to meet applicable air quality requirements.

Table C

CAM RULE EXEMPTIONS

The CAM rule does not apply to:

1. Units subject to emission limitations or standards proposed by EPA after November 15, 1990, pursuant to section 111 or 112 of the Clean Air Act. In situations where some portions of a facility operate control devices in order to comply with emission standards issued prior to November 15, 1990, only those portions of the facility must comply with the requirements of the CAM rule.

2. Situations where continuous compliance monitoring is already specified in an operating permit. The CAM rule exempts the Permittee from additional monitoring requirements and directs the Permittee to use the continuous compliance monitoring data to fulfill the CAM rule monitoring and certification requirements.

3. Stratospheric ozone protection requirements

4. Acid Rain Program requirements

5. Emission limitations or standards that apply solely under an emissions trading program

6. Municipally-owned utility peak-shaving units where
   - ⇒ the unit is exempt from all Acid Rain Program monitoring requirements, and
   - ⇒ the unit operates for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations, and
   - ⇒ the unit will be operated consistent with that purpose throughout the permit term, and

emissions from the unit are less than 50 percent of the amount required for the source to be classified as a major source, based on an average of the last 3 years, and are expected to remain so.

For additional information, please refer to the CAM rule at 40 CFR pt. 64.
Additional information, including a Technical Guidance Document that includes example submittals, is available on the Internet at http://www.epa.gov/ttn/emc/cam.html

MINNESOTA POLLUTION CONTROL AGENCY
AIR QUALITY
520 LAFAYETTE ROAD
ST. PAUL, MN 55155-4194

FACILITY DESCRIPTION: CONTROL EQUIPMENT (CE)

Show: Active Records Only
Action:
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

	ID No.	Control Equip. Status	Added By (Action)	Retired By (Action)	Operator ID for Item	Control Equip. Type	Control Equipment Description	Manufacturer	Model	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collection Efficiency (%)	Afterburner Combustion Parameters
1	CE 101	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	100S-8-20	PM10 PM	100 100	95 98	
2	CE 102	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Hoffman	4110A	PM10 PM	100 100	95 98	
3	CE 103	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	100S-8-20	PM10 PM	100 100	92 93	
4	CE 104	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	64S-8-20	PM10 PM	100 100	90 92	
5	CE 105	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	97-W-10-WA	PM10 PM	100 100	87 95	
6	CE 106	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	100S-8-20	PM10 PM	100 100	93 95	
7	CE 107	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Flex-Kleen Corp	100CT74	PM10 PM	100 100	74 92	
8	CE 108	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Pangborn Division	CM 40	PM10 PM	100 100	95 95	
9	CE 109	Active	PER 001			007	Centrifugal Collector - High Efficiency	Gamet	Unknown	PM10 PM	100 100	80 80	
10	CE 110	Active	PER 001			007	Centrifugal Collector - High Efficiency	Gamet	Unknown	PM10 PM	100 100	80 80	
11	CE 111	Active	PER 001			007	Centrifugal Collector - High Efficiency	Jacobson	Unknown	PM10 PM	100 100	80 80	
12	CE 112	Active	PER 001			007	Centrifugal Collector - High Efficiency	Jacobson	Unknown	PM10 PM	100 100	80 80	
13	CE 113	Active	PER 001			062	Dust Suppression by Chemical Stabilizers or Wetting Agents	N/A	N/A	PM10 PM	100 100	50 87	
14	CE 114	Active	PER 001			062	Dust Suppression by Chemical Stabilizers or Wetting Agents	N/A	N/A	PM10 PM	100 100	50 87	
15	CE 115	Active	PER 001			099	Other (Encl.Sett.Chamber)	N/A	N/A	PM10 PM	100 100	72 93	
16	CE 116	Active	PER 001			099	Other(Encl. Sett, Chamber)	N/A	N/A	PM10 PM	100 100	62 91	
17	CE 117	Active	PER 001			099	Other (Settling Chamber)	N/A	N/A	PM10 PM	100 100	79 87	
18	CE 118	Active	PER 001			099	Other (Settling Chamber)	N/A	N/A	PM10 PM	100 100	98 98	
19	CE 201	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	MAC	96MCF255	PM10 PM	100 100	95 99	
20	CE 202	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	MAC	1205150	PM10 PM	100 100	99 99	
21	CE 203	Active	PER 001			007	Centrifugal Collector - High Efficiency	Unknown	Unknown	PM10 PM	100 100	80 80	

MINNESOTA POLLUTION CONTROL AGENCY
AIR QUALITY
520 LAFAYETTE ROAD
ST. PAUL, MN 55155-4194

FACILITY DESCRIPTION: CONTROL EQUIPMENT (CE)

Show: Active Records Only
Action:
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

	ID No.	Control Equip. Status	Added By (Action)	Retired By (Action)	Operator ID for Item	Control Equip. Type	Control Equipment Description	Manufacturer	Model	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collection Efficiency (%)	Afterburner Combustion Parameters
22	CE 204	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-120	PM10 PM	100 100	80 80	
23	CE 205	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-66	PM10 PM	100 100	80 80	
24	CE 206	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-42	PM10 PM	100 100	80 80	
25	CE 207	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-36	PM10 PM	100 100	80 80	
26	CE 208	Active	PER 001			007	Centrifugal Collector - High Efficiency	Unknown	Unknown	PM10 PM	100 100	97 97	
27	CE 209	Active	PER 001			007	Centrifugal Collector - High Efficiency	Unknown	Unknown	PM10 PM	100 100	80 80	
28	CE 210	Active	PER 001			007	Centrifugal Collector - High Efficiency	MAC	Unknown	PM10 PM	100 100	99 99	
29	CE 301	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Flex-Kleen Corp	84 UDC 2401	PM10 PM	100 100	79 95	
30	CE 302	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Flex-Kleen Corp	58-CT-14	PM10 PM	100 100	82 95	
31	CE 303	Active	EIS 001			007	Centrifugal Collector - High Efficiency	Alanco	HE-36	PM10 PM	100 100	85 85	
32	CE 304	Active	PER 001			007	Centrifugal Collector - High Efficiency	MAC	HE-33	PM10 PM	100 100	80 80	
33	CE 401	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-84	PM10 PM	100 100	99 99	
34	CE 402	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-84	PM10 PM	100 100	99 99	
35	CE 403	Active	PER 001			007	Centrifugal Collector - High Efficiency	Kice	CK-84	PM10 PM	100 100	98 99	
36	CE 601	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	DCL Inc	FS 260	PM10 PM	100 100	99 99	
37	CE 602	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	MAC	120MCF572	PM10 PM	100 100	79 94	
38	CE 603	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Flex-Kleen Corp	58-74M-54	PM10 PM	100 100	96 99	
39	CE 604	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Mikropulsaire Corp	144S-8-20	PM10 PM	100 100	99 99	
40	CE 605	Active	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F	Flex-Kleen Corp	58-CT-14	PM10 PM	100 100	99 99	
41	CE 606	Active	PER 001			007	Centrifugal Collector - High Efficiency	Gerber	Unknown	PM10 PM	100 100	87 95	
42	CE 607	Active	PER 001			099	Other (Settling C	N/A	N/A	PM10 PM	100 100	84 96	

MINNESOTA POLLUTION CONTROL AGENCY
AIR QUALITY
520 LAFAYETTE ROAD
ST. PAUL, MN 55155-4194

FACILITY DESCRIPTION: CONTROL EQUIPMENT (CE)

Show: Active Records Only
Action:
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

	ID No.	Control Equip. Status	Added By (Action)	Retired By (Action)	Operator ID for Item	Control Equip. Type	Control Equipment Description	Manufacturer	Model	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collection Efficiency (%)	Afterburner Combustion Parameters
43	CE 608	Active	PER 001			099	Other(Settling C	N/A	N/A	PM10 PM	100 100	84 96	
44	CE 609	Active	PER 001			099	Other (Settling C	N/A	N/A	PM10 PM	100 100	84 96	
45	CE 610	Active	PER 001			099	Other(Settling C	N/A	N/A	PM10 PM	100 100	70 93	
46	CE 611	Active	PER 001			099	Other(Settling C	N/A	N/A	PM10 PM	100 100	70 93	
47	CE 612	Active	PER 001			099	Other (Settling C	N/A	N/A	PM10 PM	100 100	70 93	

MINNESOTA POLLUTION CONTROL AGENCY
AIR QUALITY
520 LAFAYETTE ROAD
ST. PAUL, MN 55155-4194

FACILITY DESCRIPTION: Potential-to-emit (by item)

Show: Active Records Only
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

Item	Pollutant	Added By (Action)	Retired By (Action)	Hourly Potential (lbs per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
EU 163							
	Carbon Monoxide	PER 001		1.58E+00	6.94E+00	6.94E+00	
	Nitrogen Oxides	PER 001		1.89E+00	8.26E+00	8.26E+00	
	Sulfur Dioxide	PER 001		1.10E-02	5.00E-02	5.00E-02	
	Volatile Organic Compounds	PER 001		1.04E-01	4.54E-01	4.54E-01	
EU 165							
	Carbon Monoxide	PER 001		1.48E+00	6.48E+00	6.48E+00	
	Nitrogen Oxides	PER 001		1.76E+00	7.72E+00	7.72E+00	
	Sulfur Dioxide	PER 001		1.10E-02	4.60E-02	4.60E-02	
	Volatile Organic Compounds	PER 001		9.70E-02	4.24E-01	4.24E-01	
EU 702							
	Carbon Monoxide	PER 001		5.34E+00	2.34E+01	1.85E+01	
	Nitrogen Oxides	PER 001		6.35E+00	2.78E+01	2.20E+01	
	Particulate Matter < 10 micron	PER 001		4.83E-01	2.12E+00	1.67E+00	
	Total Particulate Matter	PER 001		4.83E-01	2.12E+00	1.67E+00	
	Sulfur Dioxide	PER 001		3.80E-02	1.67E-01	1.32E-01	
	Volatile Organic Compounds	PER 001		3.49E-01	1.53E+00	1.21E+00	
EU 703							
	Carbon Monoxide	PER 001		3.09E-01	1.33E+01	1.35E+00	
	Nitrogen Oxides	PER 001		5.02E+00	3.81E+01	2.20E+01	
	Particulate Matter < 10 micron	PER 001		7.53E-01	3.25E+01	3.30E+00	
	Total Particulate Matter	PER 001		8.58E-01	3.71E+01	3.76E+00	
	Sulfur Dioxide	PER 001		9.82E+00	4.24E+02	4.30E+01	
	Volatile Organic Compounds	PER 001		1.40E-02	7.46E-01	7.60E-02	
FS 008							
	Particulate Matter < 10 micron	PER 001		8.00E-02	1.67E-01	1.67E-01	
	Total Particulate Matter	PER 001		3.41E-01	7.50E-01	7.50E-01	
FS 009							
	Particulate Matter < 10 micron	PER 001		8.00E-02	1.67E-01	1.67E-01	
	Total Particulate Matter	PER 001		3.41E-01	7.50E-01	7.50E-01	
FS 010							
	Particulate Matter < 10 micron	PER 001		6.00E-03	7.00E-03	7.00E-03	
	Total Particulate Matter	PER 001		2.70E-02	3.00E-02	3.00E-02	
FS 014							
	Particulate Matter < 10 micron	PER 001		3.20E-02	3.50E-02	3.50E-02	
	Total Particulate Matter	PER 001		2.10E-01	2.30E-01	2.30E-01	
FS 015							
	Particulate Matter < 10 micron	PER 001		6.25E-01	2.74E+00	2.74E+00	
	Total Particulate Matter	PER 001		2.50E+00	1.10E+01	7.12E+00	
FS 028							
	Particulate Matter < 10 micron	PER 001		6.50E-01	2.85E+00	2.85E+00	
	Total Particulate Matter	PER 001		4.40E+00	1.93E+01	1.55E+01	
FS 040							
	Particulate Matter < 10 micron	PER 001		2.90E-02	1.25E-01	1.25E-01	
	Total Particulate Matter	PER 001		5.80E-01	8.50E-01	8.50E-01	

FACILITY DESCRIPTION: Potential-to-emit (by item)

Show: Active Records Only
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

Item	Pollutant	Added By (Action)	Retired By (Action)	Hourly Potential (lbs per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
FS 047							
	Particulate Matter < 10 micron	PER 001		1.03E+00	4.51E+00	4.51E+00	
	Total Particulate Matter	PER 001		6.94E+00	3.04E+01	3.04E+01	
FS 048							
	Hexane	PER 001		6.17E+01	2.70E+02	2.70E+02	
	Volatile Organic Compounds	PER 001		9.64E+01	4.22E+02	4.22E+02	
FS 049							
	Total Particulate Matter	PER 001		1.57E-01	6.90E-01	6.90E-01	
FS 050							
	Particulate Matter < 10 micron	PER 001		3.00E-02	1.30E-01	1.30E-01	
SV 001							
	Particulate Matter < 10 micron	PER 001		1.81E-01	3.76E+00	7.90E-01	
	Total Particulate Matter	PER 001		2.70E-01	5.65E+00	1.19E+00	
SV 002							
	Particulate Matter < 10 micron	PER 001		4.40E-02	1.94E-01	1.94E-01	
	Total Particulate Matter	PER 001		5.70E-02	2.50E-01	2.50E-01	
SV 003							
	Particulate Matter < 10 micron	PER 001		1.81E-01	3.76E+00	7.90E-01	
	Total Particulate Matter	PER 001		2.72E-01	5.65E+00	1.19E+00	
SV 004							
	Particulate Matter < 10 micron	PER 001		1.59E-01	7.08E+00	7.00E-01	
	Total Particulate Matter	PER 001		2.50E-01	1.11E+01	1.10E+00	
SV 005							
	Particulate Matter < 10 micron	PER 001		3.30E-01	8.65E+00	1.43E+00	
	Total Particulate Matter	PER 001		4.50E-01	1.20E+01	1.97E+00	
SV 006							
	Particulate Matter < 10 micron	PER 001		2.17E-01	1.00E+00	9.50E-01	
	Total Particulate Matter	PER 001		3.00E-01	1.75E+00	1.31E+00	
SV 007							
	Particulate Matter < 10 micron	PER 001		2.16E-01	1.26E+00	9.50E-01	
	Total Particulate Matter	PER 001		3.60E-01	2.10E+00	1.58E+00	
SV 011							
	Particulate Matter < 10 micron	PER 001		1.77E-01	2.59E+00	7.80E-01	
	Total Particulate Matter	PER 001		3.20E-01	4.68E+00	1.40E+00	
SV 012							
	Particulate Matter < 10 micron	PER 001		4.58E-01	1.03E+01	2.01E+00	
	Total Particulate Matter	PER 001		8.23E-01	1.86E+01	3.61E+00	
SV 013							
	Particulate Matter < 10 micron	PER 001		6.30E-02	2.74E-01	2.74E-01	
	Total Particulate Matter	PER 001		2.50E-01	1.10E+00	1.10E+00	
SV 016							
	Particulate Matter < 10 micron	PER 001		8.20E-02	3.61E-01	3.61E-01	
	Total Particulate Matter	PER 001		3.30E-01	1.45E+00	1.45E+00	

FACILITY DESCRIPTION: Potential-to-emit (by item)

Show: Active Records Only
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

Item	Pollutant	Added By (Action)	Retired By (Action)	Hourly Potential (lbs per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
SV 017							
	Particulate Matter < 10 micron	PER 001		8.20E-02	3.61E-01	3.61E-01	
	Total Particulate Matter	PER 001		3.30E-01	1.45E+00	1.45E+00	
SV 018							
	Particulate Matter < 10 micron	PER 002		7.16E-01	3.13E+00	3.13E+00	
	Total Particulate Matter	PER 002		7.16E-01	3.13E+00	3.13E+00	
SV 019							
	Particulate Matter < 10 micron	PER 001		4.80E-01	2.12E+00	2.12E+00	
	Total Particulate Matter	PER 001		7.02E-01	3.07E+00	3.07E+00	
SV 020							
	Particulate Matter < 10 micron	PER 001		4.50E-01	2.34E+00	1.97E+00	
	Total Particulate Matter	PER 001		7.08E-01	4.00E+00	3.10E+00	
SV 021							
	Particulate Matter < 10 micron	PER 001		2.00E-03	2.70E-02	1.00E-02	
	Total Particulate Matter	PER 001		3.00E-03	4.00E-02	1.50E-02	
SV 022							
	Particulate Matter < 10 micron	PER 001		1.70E+00	7.45E+00	7.45E+00	
	Total Particulate Matter	PER 001		3.05E+00	1.34E+01	1.34E+01	
SV 023							
	Particulate Matter < 10 micron	PER 001		1.36E+00	5.96E+00	5.96E+00	
	Total Particulate Matter	PER 001		2.44E+00	1.07E+01	1.07E+01	
SV 024							
	Particulate Matter < 10 micron	PER 001		5.40E-02	2.37E-01	2.37E-01	
	Total Particulate Matter	PER 001		9.00E-02	3.90E-01	3.90E-01	
SV 027							
	Particulate Matter < 10 micron	PER 001		2.31E+00	1.09E+01	1.01E+01	
	Total Particulate Matter	PER 001		2.31E+00	1.09E+01	1.01E+01	
SV 029							
	Particulate Matter < 10 micron	PER 001		9.80E-01	4.30E+00	4.30E+00	
	Total Particulate Matter	PER 001		1.22E+00	5.32E+00	5.32E+00	
SV 030							
	Particulate Matter < 10 micron	PER 001		1.52E+00	6.67E+00	6.67E+00	
	Total Particulate Matter	PER 001		1.92E+00	8.40E+00	8.40E+00	
SV 031							
	Particulate Matter < 10 micron	PER 001		9.80E-01	4.30E+00	4.30E+00	
	Total Particulate Matter	PER 001		1.22E+00	5.32E+00	5.32E+00	
SV 036							
	Particulate Matter < 10 micron	PER 001		1.60E-01	8.02E-01	7.00E-01	
	Total Particulate Matter	PER 001		2.60E-01	1.32E+00	1.15E+00	
SV 037							
	Particulate Matter < 10 micron	PER 001		2.10E-01	2.60E+00	9.10E-01	
	Total Particulate Matter	PER 001		3.00E-01	3.72E+00	1.31E+00	
SV 038							
	Particulate Matter < 10 micron	PER 001		5.00E-02	3.45E-01	2.35E-01	

FACILITY DESCRIPTION: Potential-to-emit (by item)

Show: Active Records Only
AQD Facility ID: 07300002
Facility Name: Ag Processing Inc - Dawson

Item	Pollutant	Added By (Action)	Retired By (Action)	Hourly Potential (lbs per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
SV 038							
	Total Particulate Matter	PER 001		1.33E-01	8.60E-01	5.90E-01	
SV 039							
	Particulate Matter < 10 micron	PER 001		7.70E-01	6.44E+00	3.38E+00	
	Total Particulate Matter	PER 001		1.35E+00	1.13E+01	5.91E+00	
SV 041							
	Particulate Matter < 10 micron	PER 001		4.90E-01	2.17E+00	2.17E+00	
	Total Particulate Matter	PER 001		1.98E+00	8.67E+00	8.67E+00	
SV 042							
	Particulate Matter < 10 micron	PER 001		4.90E-01	2.17E+00	2.17E+00	
	Total Particulate Matter	PER 001		1.98E+00	8.67E+00	8.67E+00	
SV 043							
	Particulate Matter < 10 micron	PER 001		4.90E-01	2.17E+00	2.17E+00	
	Total Particulate Matter	PER 001		1.98E+00	8.67E+00	8.67E+00	
SV 044							
	Particulate Matter < 10 micron	PER 001		1.20E-01	5.32E-01	5.32E-01	
	Total Particulate Matter	PER 001		4.90E-01	2.13E+00	2.13E+00	
SV 045							
	Particulate Matter < 10 micron	PER 001		1.20E-01	5.32E-01	5.32E-01	
	Total Particulate Matter	PER 001		4.90E-01	2.13E+00	2.13E+00	
SV 046							
	Particulate Matter < 10 micron	PER 001		1.20E-01	5.32E-01	5.32E-01	
	Total Particulate Matter	PER 001		4.90E-01	2.13E+00	2.13E+00	
SV 048							
	Particulate Matter < 10 micron	PER 001		5.00E-02	2.75E-01	2.25E-01	
	Total Particulate Matter	PER 001		9.00E-02	4.58E-01	4.58E-01	
SV 049							
	Particulate Matter < 10 micron	PER 001		1.00E-03	3.00E-03	3.00E-03	
	Total Particulate Matter	PER 001		3.00E-03	1.10E-02	1.10E-02	
SV 055							
	Particulate Matter < 10 micron	PER 001		4.60E-01	2.03E+00	2.03E+00	
	Total Particulate Matter	PER 001		7.60E-01	3.33E+00	3.33E+00	
SV 056							
	Particulate Matter < 10 micron	PER 001		1.00E-03	3.00E-03	3.00E-03	
	Total Particulate Matter	PER 001		3.00E-03	3.00E-03	1.30E-02	
SV 057							
	Particulate Matter < 10 micron	PER 001		6.00E-02	2.76E-01		
	Total Particulate Matter	PER 001			1.30E-01	5.52E-01	

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

JUL 18 2011

CERTIFIED MAIL: 70093410000190189046
RETURN RECEIPT REQUESTED

Mr. Blake Hendrix
Ag Processing, Inc.
P.O. Box 427
St. Joseph, MO 64502

Re: Ag Processing, Inc., 021-0060
Permit Number: **OP2011-032**

Dear Mr. Hendrix:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC, P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jdk

Enclosures

c: Kansas City Regional Office
PAMS File: 2006-09-013

Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2011-032
Expiration Date: JUL 17 2016
Installation ID: 021-0060
Project Number: 2006-09-013

Installation Name and Address
Ag Processing, Inc.
P.O. Box 427
St. Joseph, MO 64502
Buchanan County

Parent Company's Name and Address
Ag Processing, Inc.
P.O. Box 2047
Omaha, NE 68103

Installation Description:
Ag Processing, Inc. operates a soybean processing facility in St. Joseph, Missouri. The installation consists of an oil extraction plant, an oil refinery plant and a hydrogen gas plant.

JUL 18 2011
Effective Date

Kyra L Moore
Director or Designee
Department of Natural Resources

EU #	EP ID #	Description
EU0050	EP-11	North House Garner & Scale
EU0060	EP-12	South House Garner & Scale

b) This rule does not apply to the Bean Heater Aspirator (EU0240) because only column dryers and rack dryers at grain elevators are subject to the rule.
c) This rule does not apply to the emission units that follow after the Bean Heater Aspirator (EU0240) because according to the EPA Applicability Determination Index Control No. 9800095, equipment that is part a process which alters the grain, so that the material is no longer a grain, and equipment that handles the altered material, are not part of the affected facility.

None of the other NSPS standards applies.

Maximum Achievable Control Technology (MACT) Applicability

1) 40 CFR Part 63, Subpart GGGG, *National Emission SStandards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production*
   a) This rule applies to the installation. The applicable provisions are listed in Permit Condition PW001.

2) 40 CFR Part 63, Subpart Q, *National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers*
   a) This rule applies to industrial process cooling towers that are operated with chromium-based water treatment chemicals. The installation's cooling towers do not use chromium-based water treatment chemicals.

None of the other MACT standards applies.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other NESHAP standards applies.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule does not apply to Receiving Legs (EU0040) because construction permit 052007-007, Special Condition 11, limits the total oilseed throughput (measured per 40 CFR 63.2855) to 1,314,000

tons for any consecutive 12-month period. The throughput limit exempts the unit from any applicable standard and limits the PTE of PM_{10} to below major levels.

Other Regulatory Determinations

1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
   a) 10 CSR 10-6.400 applies to the emission units in the following table. The emission rate calculations demonstrates that these emission units are in compliance with both the PM Emission Rate and the PM Concentration provided that the required control devices are in operation and working properly:

   Emission Rate Limit

   If $P \leq 60{,}000$ lb/hr: Emission Rate Limit (lb/hr) $E = 4.1(P)^{0.67}$

   If $P > 60{,}000$ lb/hr: Emission Rate Limit (lb/hr) $E = 55.0(P)^{0.11} - 40$

   Where: P = process weight rate

   PM Emission Rate

   Emission Rate (lb/hr) = MHDR (ton/hr) x PM Emission Factor (lb/ton) x (1-Control Efficiency/100)

EU #	Description	MHDR (ton/hr)	Emission Factor (lb/ton)	SCC Code	Emission Factor Source	Overall Control Device Efficiency (%)	Controlled PM Emission Rate (lb/hr)	Allowable PM Emission Rate (lb/hr)
EU0080	Cracking & Dehulling	100	3.3	30200785	1	99	3.30	51.28
EU0090	Hull Grinder	100	2.0	30200786	1	99.8	0.40	51.28
EU0100	Pellet Cooler	10	3.6	30200816	2	99	0.36	19.18
EU0150	Truck Meal Loadout	250	0.27	30200791	3	98.7	0.88	60.96
EU0260	Secondary Dehulling	50	3.3	30200785	1	99	1.65	44.58
EU0270	Cascade Cooler	50	1.8	30200790	1	99	0.90	44.58

Emission Factor Reference List:

EPA WEBFIRE Factor Information Retrieval Data System, 2005

EPA document AP-42 Table 9.9.1-2

EPA document AP-42 Table 9.11.1-1

PM Concentration

Emission rate (gr/dscf) = Emission Rate (lb/hr) x (7000 grains/lb)/Stack flow rate (SCFM)/60(min/hr)

Flow rates converted from actual to standard conditions using the ideal gas law.

EU #	Controlled Emission Rate (lb/hr)	Stack Temp °F	Stack Flow		Controlled Emission Rate (gr/scf)	Allowable Emission Rate (gr/scf)
			ACFM	SCFM		
EU0080	3.30	80	36,000	35,333	0.011	0.3
EU0090	0.40	77	18,000	17,765	0.003	0.3
EU0100	0.36	80	7,000	6,870	0.006	0.3
EU0150	0.88	77	42,500	41,946	0.002	0.3
EU0260	3.33[1]	155	57,113	49,219	0.011	0.3
EU0270						